

May 6, 2005

Crystal Bertheau
Elections Department
Santa Cruz County
701 Ocean Street, Room 210
Santa Cruz, CA 95060

**Re: Your Request for Advice
Our File No. A-05-088**

Dear Ms. Bertheau:

This letter is in response to your request on behalf of the County of Santa Cruz for advice regarding the campaign provisions of the Political Reform Act (the "Act").¹

QUESTION

May committees involved in a ballot measure election to be held on July 26, 2005, combine the second pre-election campaign statement with the first semi-annual statement due July 31, 2005?

CONCLUSION

In connection with the July 26, 2005, ballot measure election, committees may use a filing schedule that combines the second pre-election campaign statement with the semi-annual statement due on July 31, 2005.

ANALYSIS

During a ballot measure election, committees involved in the election are required to file two campaign statements disclosing contributions received and expenditures made in connection with that election. These pre-election campaign statements are generally filed 40 days before the election and again 12 days before the election. (Section 84200.8.) Semi-annual statements are filed January 31 and July 31, respectively. (Section 84200.)

¹ Government Code sections 81000 – 91014. Commission regulations appear at Title 2, sections 18109-18997, of the California Code of Regulations.

There is a mechanism in the Act that permits the combining of statements when an overlapping reporting period occurs, or the filing of the semi-annual statement would be an additional, unnecessary filing to the two pre-election statements. (Section 84205.) In this case, filing the two pre-election statements in connection with the July 26, 2005, election will satisfy the semi-annual filing requirement.

A campaign statement filing schedule that outlines the due dates for filing statements in connection with the election is enclosed for your convenience.

If I may be of any further assistance, please do not hesitate to contact me at (866) 275-3772.

Sincerely,

Luisa Menchaca
General Counsel

By: Kevin S. Moen
Political Reform Consultant
Technical Assistance Division

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